

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:11-cr-00186-S
)	
JOSEPH CARAMADRE, and)	
RAYMOUR RADHAKRISHNAN)	
)	

MOTION TO CONTINUE HEARING

Now comes the Defendant, Joseph Caramadre, through counsel, and hereby moves this Honorable Court to continue the hearing on Defendant's motion to withdraw his guilty plea for a period of four weeks, to any date after May 20, 2013.

For reason, counsel informs the Court that due to the myriad issues, voluminous documentation, and complicated nature of this case, a brief continuance is required in order to properly complete the preparation for the hearing. Mr. Caramadre has submitted highly meritorious reasons in support of his motion to withdraw. The Government has had four years involvement with this case; Attorneys Traini and Lepizzera, who apparently will be called as witnesses by the Government, have similar familiarity with the case. Undersigned counsel has had barely two months in which to digest over 350,000 documents associated with this case, the review and analysis of which are indispensable to a proper presentation of Mr. Caramadre's claims at the hearing. Moreover, fully one week of preparation time was lost responding to the Government's unsuccessful requests to subpoena virtually the entire case file, as well as to conduct interviews with former counsel, requests which were ultimately found to be "overbroad", and denied by this Court. Furthermore, it appears that some documentation which may be important to Mr.

Caramadre's motion may have been withheld from him as "work product." A formal request has been made to present counsel for Attorneys Traini and Lepizzera for production of any such material to Mr. Caramadre. In light of these facts, fundamental fairness requires that Mr. Caramadre be given sufficient time to complete his preparation for the hearing. This is the only request to continue the hearing date, and if granted, Mr. Caramadre will not seek any further continuances.

Respectfully submitted,
Joseph Caramadre,
By his attorneys,

/s/ Randy Olen

Randy Olen, Esq.
478A Broadway
Providence, RI 02909
(401) 274-1400
(401) 274-2480 (fax)

/s/ Robert D. Watt, Jr.

Robert D. Watt, Jr., Esq.
84 Ship Street
Providence, RI 02903
(401) 273-0484
(401) 453-4906 (fax)

CERTIFICATION

I hereby certify that on this 21st day of April, 2013, I caused to be delivered, via electronic delivery, the within ***Motion*** to:

John P. McAdams, Esq.
U.S. Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903

Lee Vilker, Esq.
U.S. Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903

Olin W. Thompson, Esq.
Federal Defender's Officer
10 Weybosset Street, Suite 300
Providence, RI 02903

/s/ Randy Olen
